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May 9, 2024

VIA ECF

Hon. Arun Subramanian
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St. Courtroom 15
New York, NY 10007-1312

Re: *Flynn et al, v. Cable News Network, Inc.*, No. 1:21-cv-02587-AS-SLC

Dear Judge Subramanian:

We represent Defendant Cable News Network Inc. (“CNN”) in the above-referenced action. We write to request a brief extension of time to file CNN’s application for fees pursuant to Federal Rule of Civil Procedure 54(d) to recover reasonable attorneys’ fees and costs under the fee-shifting provision in Rhode Island’s invasion of privacy statute, R.I. Gen. Laws § 9-1-28.1(b).

This Court granted CNN’s motion to for summary judgment in this action on April 24, 2024, and entered Judgment for CNN on April 25, 2024. According to Rule 54, CNN’s fee petition would be due today, May 9, 2024. CNN respectfully requests [three business days, until May 14, to file the petition](#) because of the complexity of reviewing, redacting and attaching the correct billing records for this litigation, which has lasted for three years. In particular, as this Court is aware, there are two related litigations pending in the United States District Court for the Middle District of Florida and by agreement of the parties and with the awareness of the Court, the parties consolidated discovery in all three matters. My office is endeavoring to review the records to ensure that the correct amount of fees and costs be attributed to this matter and that is taking some time.

CNN has not previously requested this extension, and there are no pending deadlines that would be affected by this request. Plaintiffs do not object to this request. Thank you for your consideration.

SO ORDERED.

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A handwritten signature in blue ink, appearing to read 'Arun Subramanian'.

Arun Subramanian, U.S.D.J.
Date: May 9, 2024

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Respectfully submitted,

Davis Wright Tremaine LLP

/s/ Katherine M. Bolger

Katherine M. Bolger

cc: Counsel of Record (via ECF)